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Attorneys for Plaintiff PATRICK S. BUMPUS,
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For Additional Counsel, See Next Page

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

PATRICK S. BUMPUS, Individually, and on
Behalf of the Class,

Plaintiff,

vs.

U.S. FINANCIAL LIFE INSURANCE
COMPANY, an Ohio Corporation,

Defendant.

Case No.: 2:20-cv-00926-MCE-AC

**JOINT STIPULATION AND ORDER TO
AMEND COMPLAINT**

Hon. Morrison C. England, Jr.
Action Filed: May 5, 2020
Trial: None

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Attorneys for Defendant U.S. FINANCIAL LIFE INSURANCE COMPANY

1 Plaintiff PATRICK S. BUMPUS, Individually, and on Behalf of the Class, and Defendant
2 U.S. FINANCIAL LIFE INSURANCE COMPANY, an Ohio Corporation, (the “Parties”) by and
3 through their respective counsel of record, jointly stipulate and agree as follows:

4 WHEREAS, on May 5, 2020, Plaintiff filed a putative Class Action Complaint
5 (“Complaint”) (ECF No. 1) against U.S. Financial Life Insurance Company;

6 WHEREAS, in the initial complaint Plaintiff Patrick Bumpus bring claims on behalf of
7 himself, and the putative class;

8 WHEREAS Plaintiff seeks to file his First Amended Complaint adding an additional
9 Plaintiff, Cyrus Sanchez, bringing claims on behalf of himself and the putative class;

10 WHEREAS the proposed First Amended Complaint does not add any causes of action;

11 WHEREAS a copy of Plaintiff’s proposed First Amended Complaint is attached hereto as
12 Exhibit “A”; and

13 WHEREAS, by entering into this stipulation, U.S. Financial Life Insurance Company does
14 not waive and expressly reserves all defenses in this action, including but not limited to its
15 objections and opposition to class certification.

16 IT IS HEREBY STIPULATED, by and between Plaintiff and Defendant, by and through
17 their respective counsel, that:

- 18 1. Without waiver of Defendant’s defenses, Plaintiff should be granted leave to amend to
19 file his First Amended Complaint, a copy of which is attached hereto as Exhibit “A”;
20 2. Defendant’s responsive pleading shall be due thirty (30) days after the First Amended
21 Complaint is filed.

22 **IT IS SO STIPULATED:**

23 DATED: January 22, 2024

WINTERS & ASSOCIATES

24 By: /s/ Jack. B. Winters
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Attorneys for Plaintiff
PATRICK S. BUMPUS, Individually,
and on Behalf of the Class

DATED: January 22, 2024

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Attorneys for Defendant U.S. FINANCIAL LIFE
INSURANCE COMPANY, an Ohio Corporation

ATTESTATION PURSUANT TO L.R. 131(e)

The filer, pursuant to L.R. 131(e), hereby states that all counsel signing hereon have
authorized the submission of this document on that counsel's behalf on this date.

DATED: January 22, 2024


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By: /s/ Jack. B. Winters
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ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Dated: January 22, 2024


MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE